

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Fynale Barnwell and Shavell)	Case No.: 3:23-cv-583-SAL
Barnwell, individually, and as natural)	
parents and guardians of, M.B., a)	
Minor Child,)	
)	
Plaintiff(s),)	
)	
v.)	
)	
Lexington School District One,)	PLAINTIFF'S ANSWERS TO LOCAL
GERRITA POSTLEWAIT, in her)	RULE 26.01
individual capacity, NICOLE)	
LIVINGSTON, in her individual)	
capacity, JACOB SMITH, in his)	
individual capacity, and South)	
Carolina Department of Education,)	
)	
Defendants.)	

Plaintiff(s), by and through their undersigned counsel, hereby answers Local Civil

Rule 26.01 Interrogatories as follows:

- A. State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: Plaintiff does not know of any subrogation interest involved in this case.

- B. As to each claim, state whether it should be tried jury or nonjury and why.

ANSWER: Plaintiff demands a jury trial on all causes of action.

- C. State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of the ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: N/A.

- D. State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

ANSWER: Plaintiff filed this action in the Columbia division as it is where a substantial part of the events and omissions giving rise to the claim occurred.

- E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Plaintiff is not aware of any related cases pending in this District.

Respectfully submitted,

s/Tyler D. Bailey
Federal ID #12294
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Columbia, South Carolina